IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

INFOGATION CORPORATION,	§	
	§	
Plaintiff	§	
	§	
v.	§	NO. 6:20-cv-0366
	§	
GOOGLE LLC,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	
	§	

DECLARATION OF BOCHUN ZHANG

I, Bochun Zhang, declare and state:

1.   I am a Software Engineer for Google's Directions API, which is part of the Google Maps Platform, previously often referred to as "Google Maps API", and I work out of Google LLC's ("Google") Mountain View, California office. I provide this declaration in support of Google's motion to transfer the above-captioned action in the United States District Court for the Southern District of California.

2.   I understand and have been informed that the allegations in this case are directed against the Google Maps API (now officially known as Google Maps Platform), and specifically accused features relating to the creation, formatting, and use of directions and route information, which is controlled by the Directions API that is a part of the Google Maps Platform. I submit this declaration based upon my knowledge of the corporate structure of Google and my investigation of the location of witnesses and evidence related to the accused features of the Google Maps Platform.

3.   Google has been headquartered in Northern California since its founding in 1998. It has been headquartered in Mountain View, California since 2003.

4.   Google's Mountain View headquarters (including its offices in Sunnyvale and San Francisco) is the strategic center of Google's business and houses thousands of employees making up over 35% of Google's total worldwide employees, including engineers, product managers, executives, and staff.

5.   Based on my knowledge and investigation to date, in addition to myself, at least the following additional Google employees have knowledge and/or managerial responsibility regarding the design, development, and operation of the accused features of the Google Maps Platform:

- Yaron Fidler is a Product Manager for the Directions API and is located in Mountain View, California.

- Jeffrey Hightower, is an Engineering Director responsible for driving directions in Google Maps located in Seattle, Washington. Dr. Hightower works with the engineers and project leads for the Directions API in California, and is able to perform his work functions when traveling to Google's headquarters in California. Dr. Hightower and his team work on features for Google servers that store and process data for routes, directions, traffic, and maps used by the accused features of the Google Maps Platform.

6.   In addition, I manage a team of about nine engineers who work on the Directions API and all members of the team are located in Mountain View, California.

7.   Nearly all the documents, such as those generated by managers, project leads, or engineers that relate to the development or operation of the accused features of the Google Maps Platform, including highly confidential proprietary source code, are either physically present in or electronically accessible from Mountain View as that is where the persons most qualified to identify and locate such documents reside.

8.   The data that the accused features of the Google Maps Platform display about geographic locations, including data for routes and traffic, are provided by and stored in servers and data centers that are owned and operated by Google.

9.   No Google employees who work on accused features of the Google Maps Platform are based in Texas.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Mountain View, California on August 14, 2020

By: _____
Bochun Zhang